

OGC 70-0265

OGC REVIEW COMPLETED

13 February 1970

MEMORANDUM FOR: Executive Director-Comptroller

SUBJECT: Summary of Approval Policy Proposal

1. This memorandum is for information.
2. I am not sure that uniformity in approval procedures is absolutely necessary or even desirable, but maybe this can best be put to the test by trying it out. Also, I am not certain whether the proposed uniform regulations would impair such authorizations as the special contract delegations to the DDS&T contracting officers.
3. There are special situations which this proposal presumably would bring up for review, such as the requirement that compensation for contract and proprietary hires will not exceed the top of a GS-15 without the approval of the Director of Central Intelligence.
4. At various times, starting in 1944, I have struggled with the problem of defining a project. It is practically impossible to do this in a precise and all-inclusive manner, but I think the proposed definition is as good an attempt as I have seen. Also, the definition of a contract seems reasonable from our point of view.
5. As to the criteria on page 7, the only one that gives me immediate concern is number 3, requiring DCI approval where more than one contract or project is required to achieve a specific product or to achieve a specified objective. I can

think of various procurement situations where several small contracts of no particular consequence would be needed and which would present no major financial or policy problem. In addition, you might be hiring three agents or independent contractors for relatively modest sums to achieve a specified objective, and it would seem that in many cases there would be no need for DCI approval.

6. The approval level of \$200,000 I suppose reflects the inflation of the last 20-odd years. This level has gone up substantially from the earliest one I remember, which I believe was \$25,000. This, however, is a matter of judgment, and I have no particular difficulty with the proposal.

s/

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General Counsel

OGC:LRH:jeb

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✓ subject DELEGATION OF AUTHORITY